



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 5

77 WEST JACKSON BOULEVARD

CHICAGO, IL 60604-3590

November 20, 2012

Michael J. Erickson, P.E.
SRI/FS Project Coordinator
ARCADIS – U.S. Inc.
10559 Citation Drive Suite 100
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Subject :Former Plainwell Impoundment and Plainwell No. 2 Dam Area Fall 2012 Bank Repair Plan Technical Memorandum - Revised November 2012 (Dated November 15, 2012)

Mr. Erickson:

The United States Environmental Protection Agency (EPA), in consultation with the Michigan Department of Environmental Quality (MDEQ), has reviewed the above-referenced document. The document describes the bank repair activities that will be implemented during the 2012 construction season.

These activities include repair in four areas:

- 1) Former Plainwell impoundment Western Channel (including smaller areas of Removal Area 13B)
- 2) Former Plainwell Impoundment Removal Area 4A
- 3) Former Plainwell Impoundment Removal Area 6B
- 4) Plainwell No. 2 Dam Area Removal Area 3A.

EPA approves, with the modifications set forth below, Georgia Pacific's proposed maintenance activities.

The following additional areas must also be addressed as you move forward with the repairs.

- a) Bank erosion in Removal Area (RA) 10A, Pipeline Crossing - In EPA's Oct. 15, 2012 letter, we requested that this area be armored with rock to stop the erosion. You have raised concerns regarding safety issues involved in the placement of rock in this area along the pipeline crossing. We agree that the benefits of additional armoring in this area must be evaluated against the risk of damaging the pipeline.

In order better evaluate this issue, we recommend that the exposed waste and bank in this area be sampled and analyzed to determine the level of PCBs present. We recommend that we meet to discuss the scope of such a sampling plan as soon as possible.

- b) In RA 10B, EPA observed a small area of exposed liner during the August 30, 2012 site visit. The rock must be replaced to cover the exposed liner.
- c) EPA and MDEQ are planning an inspection of the entire length of the Former Plainwell Impoundment Area by boat as soon as possible. We invite Georgia Pacific to join us. Please provide EPA with your available dates as soon as possible.

If you have any questions regarding these comments, please contact me at (312) 886-4314.

Sincerely,

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